

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

**POWERTRAIN, INC., A MISSISSIPPI
CORPORATION**

**PLAINTIFF/
COUNTER-DEFENDANT**

VS.

CIVIL ACTION NO. 1:11-cv-000105-GHD-DAS

**JOYCE MA, INDIVIDUALLY, AND
BEST MACHINERY & ELECTRICAL, INC.**

**DEFENDANTS
COUNTER-PLAINTIFFS**

JOYCE MA, INDIVIDUALLY

**THIRD PARTY
PLAINTIFF**

VS.

**WILLIAM H. SHAWN, AND
SHAWNCOULSON, LLP**

**THIRD PARTY
DEFENDANTS**

JOINT MOTION TO EXTEND

COME NOW the Plaintiff, PowerTrain, Inc., and Defendant, Joyce Ma, in the above-styled and captioned cause, and moves this Honorable Court to extend the deadline for the filing of Plaintiff's Response to Requests for Admissions and Requests for Production of Documents, and Ma's Response to discovery and for cause, would represent and show unto the Court the following:

I.

The Defendant, Joyce Ma, filed Requests for Admissions and Requests for Production of Documents against the Plaintiff, PowerTrain, Inc. in the above-styled and numbered cause on or about August 16, 2012. Plaintiff's Responses to Requests for Admission and Requests for Production of Documents will be due on September 16, 2012.

II.

The Plaintiff has had a family medical situation that will not allow him to be able to produce documents necessary to respond by September 16, 2012. The Plaintiff would request an additional thirty (30) days to file their response. Defendant Ma's local counsel is out of state and cannot assist Defendant with her responses.

III.

The undersigned counsel for Plaintiff has conferred with Defendants' counsel regarding the requested extension of time, and Defendants' counsel has agreed to the additional time to respond to Requests for Admissions and Requests for Production of Documents, if the Court will so allow. Plaintiff likewise has agreed to allow the Defendant an additional thirty (30) days to respond to discovery.

WHEREFORE PREMISES CONSIDERED, Plaintiff requests that the Court extend for thirty (30) days for Plaintiff to file Plaintiff's Response to Requests for Admissions and Requests for Production of Documents, and Defendant Ma to respond to Plaintiff's discovery.

Respectfully submitted,

POWERTRAIN, INC.

/s/ *Duncan Lott*

DUNCAN L. LOTT, MBN 1431
Attorney for the Plaintiff

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CERTIFICATE OF SERVICE

I, Duncan L. Lott, Counsel for the Plaintiff, do hereby certify that I have this day served a true and correct copy of the above and foregoing *Joint Motion to Extend* on Counsel of Record for the Defendant, by placing said copy in the United States Mail, postage prepaid, addressed to them at his usual post office addresses as follows:

Jeffery M. Navarro, Esq.
jeffnavarro53@att.net
P. O. Box 162
Amory, MS 38821

This the 29th day of August, 2012.

/s/ Duncan Lott
DUNCAN L. LOTT